## Exhibit A



## Christian J. Steinmetz III State Disciplinary Board

Reply to: 104 Marietta St., NW, Suite 100 Atlanta, Georgia 30303-2743

April 15, 2021

L. Lin Wood, Jr., Esq. 663 Greenview Avenue NE Atlanta, GA 30305 Via email only to <a href="mailto:lwood@linwoodlaw.com">lwood@linwoodlaw.com</a>

Re: L. Lin Wood, Jr., Esq.

State Disciplinary Board Notice of Investigation # 210010

Dear Mr. Wood:

As the Board Member to whom your matter has been assigned, I am responsible for conducting a formal investigation into the grievance that is pending against you. I will report my findings to the full Board with a recommendation whether there is probable cause to believe that your conduct is in violation of the Georgia Rules of Professional Conduct. At present, I intend to report on your matter at the May 14, 2021 Meeting.

The sworn response which you submitted to the Notice of Investigation issued in this matter does not address the conduct alleged in the Memorandum of Grievance. It would be helpful to have additional information from you so that I may fully understand your position regarding the various claims in the case. Of course, like the Rule 4-104 request that the Board made for you to undergo a mental health examination is completely voluntary, this request for additional information is also voluntary. If you choose not to provide the requested information, I will evaluate the case without the benefit of your perspective on the items requested. Whatever information you provide me in response to these requests will be kept confidential per the Board Rules.

1. The Board Grievance includes the sworn Complaint in the *Wade, et al. vs. Wood* lawsuit currently pending in the Superior Court of Fulton County. The Complaint and the information submitted by those Plaintiffs in response to the Bar's investigative subpoena vividly describes abusive, incoherent telephone calls and email communication, and violent encounters with the Plaintiffs. Please

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provide any information that you wish the Board to consider that might explain your conduct or put it into context. In particular, please explain why you physically attacked your partners and made the threatening statements described on pages 9 and 10 in the section of the Board Grievance titled "Allegations Taken from Verified Complaint in Wade, et al. v. Wood, Fulton Sup. Ct. CAFN 2020CV339937".

- 2. As listed in the Memorandum of Grievance, multiple courts have ruled that you filed lawsuits which included statements that were false and that you failed to meet basic standards of competence or to follow the courts' procedural rules. While you may have provided some information in prior communications, please take this request as your opportunity to provide any additional response you wish the Board to consider regarding these Courts' findings.
- 3. In *King et al. v. Whitmer et al.*, U.S. District Court Eastern District of Michigan, Case No. 2:20-cv-13134, did you file a motion for *pro hac vice* admission, and if so did the Court rule on your motion? Has the Court ruled on the motions for sanctions and if so, please provide a copy of the ruling.
- 4. In *Pearson et al. v. Kemp et al.*, 1:20-cv-4809 U.S. District Court Northern District of GA, why did you appeal the district court's November 29, 2020, temporary restraining order? Why did you state in the appeal that the district court denied plaintiff's requested relief? Why did you file a Stipulation of Dismissal after filing an Emergency Petition Under Rule 20 for Extraordinary Writ of Mandamus in the U.S. Supreme Court?
- 5. In Feehan v. Wisc. Elections Comm'n, 20-cv-1771, U.S. District Court Eastern District of Wisconsin, did you file a motion for pro hac vice admission, and if so did the Court rule on your motion? Why did you file the Complaint on behalf of Derrick Van Orden? Did you have his authority to name him as a plaintiff in that lawsuit? Why did you fail to include a Proposed Order with the initial motion that you filed? Why did you fail to ask for a hearing in the Proposed Order attached to the Amended Motion? Why did you fail to provide the court with

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defense counsel's address? Why did you state you were filing documents under seal when you did not?

- 6. In *Bowyer v. Ducey*, CV-20-02321, U.S. District Court, District of Arizona did you file a motion for *pro hac vice* admission, and if so did the Court rule on your motion? Did you present the Court with evidence in support of your claims and if not, why not?
- 7. In Roslyn La Liberte vs. Joy Reid, 18-CV-5398, U.S. District Court Eastern District of New York, why did you make the statements to the Court in a January 11, 2021 conference that are detailed on page 7 of the Board Grievance?
- 8. You have repeatedly stated that your statements on social media are protected by the First Amendment. Do you have any additional information or comment that you would like to make regarding the statements outlined in the Memorandum of Grievance?

As I mentioned, it is my present intention to report on your case at the May 14, 2021 Board Meeting. In order that I may have adequate time to review any responses you wish to provide to my inquiries above, please have them delivered to me no later than Friday, May 7, 2021.

Finally, March 15, 2021 was the deadline for your challenges to the competency, qualifications or objectivity of members of the State Disciplinary Board. I have reviewed your letter of March 19 and the statements that you make about possible conflicts of interest. The Board will use the process outlined within Rule 11 of the Internal Rules of the State Disciplinary Board (<a href="https://www.gabar.org/Handbook/index.cfm#handbook/part5">https://www.gabar.org/Handbook/index.cfm#handbook/part5</a>) to determine whether any member should be disqualified from participating in decisions regarding your case.

Sincerely,

Christian J. Steinmetz III

CHRISTIAN J. STEINMETZ III
Member, State Disciplinary Board